

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

Re'shane Lonzo, Personal Representative
of the Estate of Richie Majors, Deceased,

Plaintiff,

Case No.: 2:16-cv-13672
District Judge: Mark A. Goldsmith
Magistrate Judge: David R. Grand

v.

Gerlach et al,

Defendants,

RADNER LAW GROUP, PLLC
Solomon Radner (P73653)
Attorney for Plaintiff
17515 W. Nine Mile Rd. Suite 1175
Southfield, MI 48075
(313) 355-3425
solomon@radnerlawgroup.com

CHAPMAN LAW GROUP
Devlin K. Scarber (P64532)
Jeffrey L. Bomber (P85407)
*Attorneys for Savithri Kakani, P.A.
and Thomas LaNore, P.A.*
1441 West Long Lake Rd., Suite 310
Troy, MI 48098
(248) 644-6326
dscarber@chapmanlawgroup.com
jbomber@chapmanlawgroup.com

EXPEDITED CONSIDERATION REQUESTED PURSUANT TO LCR 7.1(e)

Per LCR 7.1(e), the reason for Expedited Consideration is as follows: 1) On November 14, 2022, the undersigned counsel began trial in a separate matter in the United States District Court for the Western District of Michigan, which will likely extend until December 2, 2022; 2) On November 17, 2022, the Court issued a Notice of Motion Hearing for a hearing to take place on dispositive motions on November 28, 2022 (**ECF No. 206**); 3) the Court is closed on November 24, 2022, for Thanksgiving, prompting this request for expedited consideration; 4) the

undersigned counsel will be in trial on November 28, 2022, at the United States District Court for the Western District in Lansing, Michigan, and is therefore unable to attend the November 28, 2022 motion hearing in this matter; 5) Plaintiff's counsel concurred with the instant motion so long as the motion hearing is not scheduled for the week of December 11, 2022, as Plaintiff's counsel will be unavailable.

DEFENDANTS SAVITHRI KAKANI, P.A. AND THOMAS LANORE,
P.A.'S MOTION TO ADJOURN THE NOVEMBER 28, 2022 MOTION
HEARING

NOW COME Defendants SAVITHRI KAKANI, P.A. and THOMAS LANORE, P.A., by and through their attorneys, CHAPMAN LAW GROUP, and for their Motion to Adjourn the November 28, 2022 Motion Hearing, state as follows:

1. The instant action involves constitutional claims alleging deliberate indifference to Plaintiff's medical needs.
2. On June 16, 2022, Defendants filed a Motion for Summary Judgment Pursuant to the Holding of *Phillips v. Tangilag* (**ECF No. 201**), which Plaintiff responded to on July 7, 2022. (**ECF No. 204**).
3. On November 14, 2022, the undersigned counsel began trial in the matter of *Charles Jones v. Corizon Health, et al*, at the United States District Court for the Western District of Michigan in Lansing, Michigan. The trial is scheduled to run through December 2, 2022.

4. On November 17, 2022, the Court issued a Notice of Motion Hearing by Video Conference in this matter for a hearing on the pending dispositive motions to take place on November 28, 2022. (**ECF No. 206**; *See* **ECF Nos. 199, 201, and 202**).

5. The undersigned counsel will be in trial on November 28, 2022 and is therefore unable to appear for the motion hearing.

6. Undersigned counsel brought this issue to this Honorable Court's attention on November 17, 2022, but was advised that a motion to adjourn was necessary.

7. Pursuant to Federal Rule of Civil Procedure 16(b)(4), the Court may adjourn a hearing date for good cause shown.

8. In an effort to seek concurrence to the instant motion, Plaintiff's counsel was contacted on November 18, 2022. Plaintiff's counsel concurred to this motion to adjourn the November 28, 2022 hearing to a date after the undersigned counsel's trial concludes on December 2, 2022, so long as the motion hearing is not rescheduled to the week of December 11, 2022. Plaintiff's counsel advised that he is unavailable the week of December 11, 2022.

9. The undersigned counsel requests expedited consideration based upon the circumstances set forth herein and given the quickly approaching hearing date.

WHEREFORE, Defendants SAVITHRI KAKANI, P.A. and THOMAS LANORE, P.A., respectfully request that this Honorable Court grant their Motion to Adjourn the November 28, 2022 Motion Hearing, and provide any and all such relief that the Court deems just and equitable.

Respectfully submitted,
CHAPMAN LAW GROUP

Dated: November 23, 2022

/s/Devlin Scarber

Ronald W. Chapman Sr., M.P.A.,
LL.M. (P37603)

Devlin K. Scarber (P64532)

Jeffrey L. Bomber (P85407)

Attorneys for Defendants Savithri Kakani,
P.A. and Thomas LaNore, P.A.

1441 W. Long Lake Rd., Suite 310

Troy, MI 48098

(248) 644-6326

rchapman@chapmanlawgroup.com

dscarber@chapmanlawgroup.com

jbomber@chapmanlawgroup.com

PROOF OF SERVICE

I hereby certify that on November 23, 2022, I presented the foregoing paper to the Clerk of the Court for filing and uploading to the ECF system, which will send notification of such filing to the attorneys of record listed herein and I hereby certify that I have mailed by US Postal Service the document to the involved non participants.

/s/Devlin Scarber

Devlin K. Scarber (P64532)
1441 W. Long Lake Rd., Suite 310
Troy, MI 48098
(248) 644-6326
dscarber@chapmanlawgroup.com